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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY; WISHTOYO
FOUNDATION,

Plaintiffs,

v.

DOUG BURGUM, et al.,

Federal Defendants

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

)
)
)
) Case No. 2:24-cv-05459-MWC-
) MAA
)
)
) **STIPULATION TO EXTEND**
) **FEDERAL DEFENDANTS'**
) **RESPONSE DEADLINE FOR**
) **FIRST SUPPLEMENTAL**
) **AND AMENDED**
) **COMPLAINT**
)
)
) Honorable Michelle Williams
) Court
) United States District Judge
)

1 Federal Defendants, Plaintiffs, and Intervenor-Defendant (“Parties”), having
2 conferred on this matter, respectfully move under Federal Rule of Civil Procedure
3 6(b) to extend Federal Defendants’ deadline to respond to Plaintiffs’ First
4 Supplemental and Amended Complaint by 14 days. Under Federal Rule of Civil
5 Procedure 15(a), Federal Defendants’ response deadline is currently February 13,
6 2025. The new response deadline would be February 27, 2025. In support, the
7 Parties state as follows:

8 As explained in the Parties’ Joint Status Report, ECF No. 51, new agency
9 officials at the Department of the Interior are currently in the process of
10 onboarding and familiarizing themselves with the issues presented in this case.
11 Given the change in Administration, Federal Defendants need to give the
12 appropriate officials adequate time to review Plaintiffs’ new allegations and draft
13 an appropriate response. There is therefore good cause for the requested extension.

14 For these reasons, the Parties respectfully request that the Court grant the
15 requested extension.

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17 Dated: February 11, 2025

LISA L. RUSSELL
Deputy Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

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20 /s/ Daniel C. Luecke
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5 *Attorneys for Intervenor-Defendant Sable*
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8 **CERTIFICATION OF CONCURRENCE**

9 In accordance with Local Rule 5-4.3.4, I hereby attest that I conferred with
10 the signatories to this stipulation, who expressed their concurrence.
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12 /s/ Daniel C. Luecke
13 Counsel for Federal Defendants
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